

HARRIS BEACH PLLC
ATTORNEYS AT LAW

May 21, 2019

THE OMNI
333 EARLE OVINGTON BLVD., SUITE 901
UNIONDALE, NY 11553
(516) 880-8492

KEITH M. CORBETT, ESQ.
KCORBETT@HARRISBEACH.COM

VIA ECF

Hon. Gary R. Brown
United States Magistrate Judge
United States District Court,
Eastern District of New York
100 Federal Plaza
P.O. Box 9014
Central Islip, New York 11722-9014

**Re: Joseph Jackson -v.-Nassau County, et. al
18 CV 3007 (JS)(GRB)**

Dear Judge Brown:

Our office represents the Defendants, Incorporated Village of Freeport and individual employees of the Village named as defendants the above subject litigation (the "Village Defendants.") This correspondence is submitted as a response to Plaintiff's letter motion to compel discovery.

While we consent to a conference with the Court to address the myriad of issues in this case, a settlement conference is premature at this time. Despite Plaintiff's assertions, liability against the Village Defendants has not been established. To the contrary, as more fully articulated in the Village Defendant's motion to dismiss, none of the allegations in the Amended Complaint directly relate to the Village Defendants. Moreover, after bringing this action, being directed to narrow the defendants and filing an Amended Complaint, Plaintiff still has failed to properly identify defendants in litigation and allege any claims that lie against the Village Defendants.

Despite the fact that the Village Defendants are not specifically identified in the Plaintiff's letter motion, we submit this letter in opposition to any purported relief sought against the Village Defendants. Our office, as officers of the Court, will continue to engage in good faith with all parties and does believe a conference to address this matter may be prudent.

As always, I appreciate the court's assistance in this matter. If the Court has any questions, please do not hesitate to contact the undersigned.

HARRIS BEACH PLLC
Attorneys for the Village Defendants

s/Keith M. Corbett
Keith M. Corbett, Esq.
333 Earle Ovington Blvd., Suite 901
Uniondale, New York 11553

To: All Counsel (Via ECF)